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COUNSEL FOR AMERICREDIT FINANCIAL  
SERVICES, INC., DOING BUSINESS AS  
GM FINANCIAL

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF TEXAS  
LUBBOCK DIVISION**

**IN RE:**

**REAGOR-DYKES MOTORS, LP<sup>1</sup>**

**Debtor**

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**CASE NO. 18-50214-rlj-11  
(Jointly Administered)**

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**AMERICREDIT FINANCIAL SERVICES, INC. D/B/A/ GM FINANCIAL'S  
MOTION TO EXPEDITE HEARING ON ITS MOTION FOR RELIEF FROM  
AUTOMATIC STAY PURSUANT TO 11 U.S.C. §362(d)**

**THIS DOCUMENT PERTAINS TO  
REAGOR-DYKES SNYDER, LP (CASE NO. 18-50321)**

<sup>1</sup> The Debtors are Reagor-Dykes Motors, LP (Case No. 18-50214), Reagor-Dykes Imports, LP (Case No. 18-50215), Reagor-Dykes Amarillo, LP (Case No. 18-50216), Reagor-Dykes Auto Company, LP (Case No. 18-50217), Reagor-Dykes Plainview, LP (Case No. 18-50218), Reagor-Dykes Floydada, LP (Case No. 18-50219), Reagor-Dykes Snyder, L.P. (Case No. 18-50321), Reagor-Dykes III, LLC (Case No. 18-50322), Reagor-Dykes II, LLC (Case No. 18-50323), Reagor-Dykes Auto Mall, Ltd. (Case No. 18-50324), and Reagor-Dykes Auto Mall I, LLC (Case No. 18-50325).

NOW INTO COURT, through undersigned counsel, comes **AmeriCredit Financial Services, Inc. d/b/a GM Financial** (“GM Financial”), which respectfully moves this Court to expedite the hearing on its Motion for Relief from the Automatic Stay Pursuant to 11 U.S.C. §362(d) (the “Motion”), so that its motion can be heard on February 20, 2019, at 1:30 P.M. The Motion is brought pursuant to Bankruptcy Rule 9006( c) and Local Bankruptcy Rule 9.003.1.

### **BASIS FOR EXPEDITED HEARING**

1. GM Financial requests that this hearing be set for February 20, 2019, at 1:30 P.M. so that the merits of the Motion can be determined in connection with Reagor-Dykes Snyder, L.P.’s previously filed motion to use cash collateral [Dkt. 660], which is scheduled for hearing again on that date and time, and because GM Financial continues to incur extraordinary expense in protecting its collateral with little prospects being shown for a reorganization of either Reagor-Dykes Snyder, L.P. or the Reagor-Dykes Group, generally.

2. Counsel for GM Financial has discussed this request for expedited hearing with counsel for the Debtors, who do **not** consent to this request but have requested this Court compel all parties to mediate all issues to achieve a “global resolution” [Doc. 943] (the “Mediation Motion”).

3. GM Financial, which is not listed as an “Interested Party” on Exhibit “A” to the Mediation Motion, sees little opportunity for such a gathering to make any meaningful progress and requests that its lift stay be heard.

4. Additionally, and more practically, counsel for GM Financial has suggested to counsel for the Debtors that as long as the request for use of GM Financial’s cash collateral is to

be heard on February 20th, without any agreement for such continued use, that GM Financial's lift stay motion should be heard at the same time.

5. GM Financial is filing the Declaration of its representative, Howard S. Ravitz, and attached exhibits with its Motion as required by Local Bankruptcy Rule 4001-1(e)(3).

**WHEREFORE, AmeriCredit Financial Services, Inc. d/b/a GM Financial** requests that the Court enter an order expediting the hearing on its Motion for Relief from the Automatic Stay Pursuant to 11 U.S.C. §362(d) to coincide with Reagor-Dykes Snyder's cash collateral motion on February 20, 2019; at 1:30 P.M., and for such other and further relief as it may show itself entitled.

Respectfully submitted:

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